

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

In re:  
THE ROMAN CATHOLIC DIOCESE OF  
SYRACUSE, NEW YORK,  
  
Debtor.

Case No. 20-30663-5-wak  
Chapter 11  
Hon. Wendy A. Kinsella

**DECLARATION OF REDWAN SALEH**

I, Redwan Ibn Saleh, Esq., pursuant to 28 U.S.C. § 1746(2), under penalty of perjury,  
hereby declare as follows:

1. I am an attorney at the firm O'Melveny & Myers LLP, attorneys for Westchester Fire Insurance Company ("Westchester Fire"). I am a member in good standing of the Bar of the State of New York and am admitted to practice in the United States District Courts for the Northern, Southern, and Eastern Districts of New York. I submit this declaration in support of Westchester Fire's *Motion for Entry of An Order Authorizing Westchester Fire to File a Document Provisionally Under Seal* (the "Motion"). I also submit this declaration based on my personal knowledge of the proceedings in the above-captioned bankruptcy case, and my review of the documents described below.

2. Attached hereto as Exhibit 1 is a true and correct copy of a February 9, 2021, Confidentiality Agreement entered into by the Roman Catholic Diocese of Syracuse ("Diocese") and other parties.

3. Attached hereto as Exhibit 2 is a true and correct copy of a publication of pastoral assignments titled "Pastoral Assignments – Fall 2023," as downloaded from the website of the Diocese, accessible at <https://syracusediocese.org/news/pastoral-assignments-fall-2023>.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a publication of pastoral assignments titled “Bishop Douglas J. Lucia has released the following pastoral assignments for 2023,” as downloaded from the website of the Diocese, accessible at <https://syracusediocese.org/news/bishop-douglas-j-lucia-has-released-the-following-pastoral-assignments-for-2023>.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a publication of pastoral assignments titled “New pastoral assignments announced,” as downloaded from the website of the Diocese and THE CATHOLIC SUN, accessible at <https://syracusediocese.org/news/new-pastoral-assignments-announced> and <https://thecatholicsun.com/new-pastoral-assignments-announced/>.

6. Attached hereto as **Exhibit 5** is a true and correct copy of a letter from me to Stephen Donato, dated February 16, 2024.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a letter from me to Timothy Lyster and J. Ford Elsaesser, dated February 8, 2024.

8. Attached hereto as **Exhibit 7** is a true and correct placeholder for the document bearing production number DOS\_CVA00066386, which is to be filed provisionally under seal with the Court’s permission.

I declare under penalty of perjury that the foregoing is true and correct and to the best of my knowledge and belief.

Dated: February 27, 2024

Respectfully submitted,

By: /s/ Redwan Saleh

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*Counsel for Westchester Fire Insurance Company*